

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

MBMK PROPERTY HOLDINGS, LLC

Debtor

Chapter 11

Bankruptcy No.: 22-13121-amc

MBMK Property Holdings, LLC,

Plaintiff,

v.

Wilmington Trust, National Association, As
Trustee for the Benefit of the Holders of
Corevest American Finance 2018-2 Trust
Mortgage Pass-Through Certificates; Bay
Management Group of Philadelphia, LLC;
James Paul, d/b/a James Paul of the ALPS
Group; and, ALPS Group, Inc. d/b/a James
Paul the ALPS Group,

Defendants

Adv. Pro. No.: 23-00062-amc

**NOTICE OF MOTION OF PLAINTIFF FOR PRELIMINARY INJUNCTION
COMPELLING EQUITABLE ACCOUNTING FROM ALL DEFENDANTS
AND HEARING**

The Plaintiff has filed a Motion Pursuant to Federal Rule of Bankruptcy Procedure 9014(a) for a Preliminary Injunction Compelling Equitable Accounting from All Defendants (the "Motion").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views of the motion, then on **November 8, 2024** or before you and your attorney must do all of the following:

- (a) file an answer explaining your position at

Office of the Clerk
United States Bankruptcy Court
Robert N.C. Nix Federal and Post Office Building
900 Market Street – Suite 400
Philadelphia, PA 19107

(b) mail a copy to the movant's attorneys:

Robert B. Eyre, Esquire
The Law Offices of Foehl & Eyre, P.C.
432 North Easton Road
Glenside, PA 19038
Telephone: (610) 566-5926 x115
Facsimile: (610) 552-7241
Email: rob@foehlslaw.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. A hearing on the motion is scheduled to be held before the **Honorable Ashely M. Chan** on **December 4, 2024** at **11:00 a.m.** in **Courtroom 4**, United States Bankruptcy Court, Robert N.C. Nix Federal and Post Office Building, 900 Market Street, Philadelphia, PA 19107. Unless the Court orders otherwise, the hearing on this matter will be an evidentiary hearing. The hearing will be held telephonically as follows: TELEPHONIC PROCEDURES FOR OUTSIDE CALLERS: JUDGE – Phone Number: (877) 873-8017; Access Code: 3027681. Dial in: enter Chief Judge Ashely M. Chan's Access Code followed by the # sign.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: October 22, 2024

By: 

Robert B. Eyre, Esquire
Attorney for Debtor
MBMK Property Holdings, LLC